BUSHELL, SOVAK, OZER & GULMI LLP

ATTORNEYS AT LAW www.bushellsovak.com

28 West 44th Street, #1014 New York, NY 10036

199 Branchville Road Ridgefield, CT 06877

Tele (212) 949-4700 Fax (212) 286-0513 Tele (203) 403-5132 Fax (203) 724-0866

CHRISTOPHER J. SOVAK csovak@bushellsovak.com

September 4, 2013

Electronically Filed

Judge Joseph F. Bianco United States Federal Court Eastern District of New York 100 Federal Plaza Central Islip, NY 11722

Re: Vistage Worldwide et. al. v. Ramerini, CV 13-3739(JFB, AKT)

Dear Judge Bianco:

We write on behalf of both Plaintiffs and Defendant to inform the Court that we have reached a settlement in principle with regard to the above captioned matter. In light of this development, we are seeking a thirty (30) day adjournment of the initial conference in this matter, presently scheduled for September 10, 2013, and all attendant deadlines contained in the July 9, 2013 Initial Conference and Case Management Order while we draft and finalize the settlement agreement. This would also extend the Defendant's time to file responsive papers to the complaint until October 4, 2013. While we have previously agreed with defense counsel to extend their time to respond to the complaint, this is the first request for the adjournment of any Court ordered conference or disclosure deadlines.

We thank the Court for its consideration of our request.

Respectfully Submitted,

Christopher J. Sovak, Esq.

Eve Klein, Esq.

cc: